



**NAILAH K. BYRD
CUYAHOGA COUNTY CLERK OF COURTS
1200 Ontario Street
Cleveland, Ohio 44113**

Court of Common Pleas

**New Case Electronically Filed: COMPLAINT
March 6, 2020 13:26**

By: MICHAEL J. FELDMAN 0039062

Confirmation Nbr. 1962328

AURORA MEDINA

CV 20 930597

vs.

TARGET CORPORATION

Judge: SHANNON M. GALLAGHER

Pages Filed: 4

**EXHIBIT
A**

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

AURORA MEDINA)	CASE NUMBER
15731 Mina Avenue)	
Cleveland, Ohio 44135)	JUDGE
)	
Plaintiff)	
)	
vs.)	COMPLAINT/JURY DEMAND
)	
TARGET CORPORATION)	
DBA TARGET)	
24640 Brookpark Road)	
North Olmsted, Ohio 44070)	
)	
Defendant)	

Now comes the Plaintiff, and for her Complaint against the Defendants states as follows:

1. At all times herein mentioned, Defendant, Target Corporation dba Target was a corporation duly licensed and authorized to do business in the State of Ohio and as such was doing business as a retail store located at 24646 Brookpark Road, North Olmsted, Cuyahoga County, Ohio. (hereinafter referred to as Target).
2. At all times herein mentioned, Plaintiff, Aurora Medina, was a business invitee on Defendant's premises for the purpose of shopping.
3. At all times herein mentioned, Defendant, Target was negligent in allowing a dangerous and defective condition to exist on its premises.
4. At all times herein mentioned, Defendant, Target, was negligent in allowing the lights in the handicap bathroom to work incorrectly.
5. At all times herein mentioned, Defendant, Target, was negligent in allowing a dangerous and defective condition to exist on its premises of which it had knowledge or should have had knowledge.

6. At all times herein mentioned, Defendant, Target, was negligent in breaching their duty of care to Plaintiff who was a business invitee on Defendant's premises.
7. At all times herein mentioned, Defendant, Target, was negligent in failing to warn Plaintiff of dangerous and defective conditions on its premises of which it had knowledge or should have had knowledge.
8. On or about March 13, 2018, Plaintiff, Aurora Medina, while on Defendant's premises, went into the handicap bathroom accompanied by her son, who helped her get on the toilet, and then waited outside the bathroom. After a while, her son heard lots of noises, opened the bathroom, and saw his mother on the ground in a pool of blood. Additionally, at that time, the lights in the bathroom were off. The darkness in the bathroom was the proximate cause of Plaintiff's fall.
9. As a direct and proximate result of the fall, and the negligent acts and omissions of the Defendant, Target, Plaintiff sustained a broken right femur as well as a broken nose. Plaintiff was caused great pain and suffering and was caused to seek medical care, treatment and expense for said injuries and is reasonably likely to incur future medical care, treatment and expense for said injuries which are permanent in nature.

WHEREFORE, Plaintiff, Aurora Medina, demands judgment against the Defendant, Target, in an amount in excess of Twenty- Five Thousand Dollars (\$25,000.00) together with the costs of this action.

Respectfully submitted,

/s/ Michael J. Feldman
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JURY DEMAND

A trial by jury with the maximum number of jurors allowable by law is hereby demanded.

/s/ Michael J. Feldman
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